

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ALEXANDER MASHINSKY and RONI
COHEN-PAVON,

Defendants.

Case No. 23 Cr. 347 (JGK)

ORAL ARGUMENT REQUESTED

**DEFENDANT ALEXANDER MASHINSKY'S MOTION TO PRESERVE THE
TESTIMONY OF MATERIAL WITNESSES RESIDING OUTSIDE
THE UNITED STATES**

Defendant Alexander Mashinsky, by and through undersigned counsel, respectfully moves, pursuant to Rule 15 of the Federal Rules of Criminal Procedure and 28 U.S.C. § 1783(a), to preserve the testimony of six material witnesses who reside outside the United States. In support of his motion, Defendant Alexander Mashinsky respectfully submits the accompanying Memorandum of Law, and Declaration of Michael F. Westfal and exhibits attached thereto.

REQUEST FOR ORAL ARGUMENT

Defendant respectfully requests oral argument on this motion.

Dated: New York, New York
September 14, 2024

Respectfully submitted,

/s/ Michael F. Westfal

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